



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 3, 2013

CHAIRMAN RANAE LENTZ, TREASURER
OHIO REPUBLICAN PARTY STATE CENTRAL
& EXECUTIVE COMMITTEE
211 S. FIFTH STREET
COLUMBUS, OH 43215

Response Due Date
07/08/2013

IDENTIFICATION NUMBER: C00162339

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -
11/26/2012), RECEIVED 03/19/2013

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Your amended report discloses an increase in debts totaling \$72,496.25 on Line 10 of the Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
2. Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B for Line 30(b) of your report to clarify the following descriptions: "Convention deposit - not candidate specific - AX 10/24," "convention expense - not candidate specific - AX 10/24," "GOTV expense - not candidate specific - AX 11/16," "GOTV expenses - not candidate specific - AX 11/16," "GOTV volunteer expense - not candidate specific," "GOTV volunteer expense - not candidate specific - AX 11/16," "GOTV volunteer expenses - not candidate specific - AX 11/16," "political event consulting - not candidate specific," "victory center expenses - memos = LR 10/18 - not candidate specific," "Victory center expenses - not candidate specific - AX 11/16," and "volunteer GOTV expense - not candidate specific - AX 11/16." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).
3. Schedule A supporting Line 12 discloses a transfer(s)-in from "Republican

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National Committee" and "National Republican Congressional Committee." Schedule B supporting Line 30(b) reflects payments for "GOTV doorhangers - not candidate specific," "GOTV door hangers - not candidate specific," "sign printing expense - not candidate specific," "walkbooks printing - memo = MT 11/20 - not candidate specific," and "walkbooks printing - MT 11/20 - not candidate specific." Please be advised that a state or local party committee may pay for campaign materials (such as pins, posters, bumper stickers and yard signs) that are distributed by volunteers in connection with activity on behalf of the party's nominees in a general election and for voter drive activity conducted on behalf of the party's Presidential and Vice Presidential nominees. Payments for this type of activity are exempt from the definition of a contribution or expenditure if certain conditions are met. The conditions are that no public advertising may be used, including distribution by direct mail (mailings by a commercial vendor or from commercial lists); all funds used for the activity must be permitted under the Act; none of the funds used may have been designated for a particular candidate; and finally, payments for the activity may not be made from transfers-in from the national committee to specifically fund the activity. For further guidance, please refer to 11 CFR §§100.87 and 100.147 and to the Campaign Guide for Party Committees.

If the activity disclosed on your report does not meet the definition of "exempt" activity as described above and if any portion of the expenditures were made on behalf of specifically identified candidates, that amount must be disclosed on Schedule B, E or F supporting Line 23, 24 or 25 of the Detailed Summary Page as appropriate. Please amend your report or provide clarifying information.

4. Schedule A supporting Line 12 discloses a transfer(s)-in from "Republican National Committee" and "National Republican Congressional Committee." Schedule H6 supporting Line 30(a) reflects payments for Federal Election Activity. Please be advised that under 11 CFR §300.34, a State, district or local party committee must not use any Federal funds transferred to it from a national party committee or any other State, district or local party committee, as the Federal component of an expenditure or disbursement for Federal Election Activity. Furthermore, your committee must itself raise the Federal component of expenditure or disbursement allocated between Federal and Levin funds.

Please clarify whether the transfer(s)-in was used for the subsequent payments for Federal Election Activity. In addition, please clarify the procedures you are currently using to ensure that Federal funds transferred to your committee from

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national, State, district and local party committees are not being used for Federal Election Activity.

5. Your amended report discloses additional disbursements of Levin funds totaling \$44,000 on Line 4(b) of the Schedule L Aggregation Page that were not disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR §300.36)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

Sincerely,



Brian Jones
Senior Campaign Finance Analyst
Reports Analysis Division